

# EXHIBIT A

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December 29, 2020

*Via electronic mail*

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Re: *In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Counsel:

I write in response to your December 23, 2020 letter regarding discovery related to Alp Karli and Majid Mersal.

**1. Alp Karli.** As we discussed during the December 6, 2020 meet and confer call, counsel for Saudi Arabia was able to locate Mr. Karli only after hiring a private investigator. Mr. Karli's contact information is attorney work product, and we decline your request to produce this protected information. If Plaintiffs move the Court for this contact information, Saudi Arabia intends to cross move for contact information of all non-parties who Plaintiffs intend to depose.

We have also asked whether Mr. Karli will voluntarily sit for a remote deposition. Mr. Karli has indicated that he plans to consult with counsel on this issue. We will report back as soon as we have his decision. Also, once we have confirmed that Mr. Karli will be represented by counsel in this matter, we will provide counsel's contact information so that Plaintiffs may direct further questions to them.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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**2. Majid Mersal.** The Court's June 23, 2020 Order denied Plaintiffs' motion to compel Saudi Arabia to search for or produce any documents relating to Mr. Mersal. The Court's August 11, 2020 Order reiterated that Saudi Arabia has no obligation to produce Mersal related documents that are not otherwise responsive to Plaintiffs' requests for documents. Nonetheless, Saudi Arabia offered to search for and produce Mersal-related documents from the Ministry of Islamic Affairs pertaining to his activities in California between 1998 and 2000, to request from the Ministry of Interior a copy of any passport and entry/exit records from 1998 to 2002 relating to Mr. Mersal, and to request from Mr. Mersal copies of any relevant passports, *on the condition* that this would resolve all issues relating to Plaintiffs' request for Mersal-related documents. Your letter raises for the first time a request to search for and produce documents relating to Mr. Mersal's activities "in the United States" between 1998 and 2000. We will agree to expand our conditional offer to include Mr. Mersal's activities in the United States during this time period.

Your letter also requests that the "Kingdom ... agree to conduct searches of repositories where it reasonably anticipates responsive documents may be located, for documents relevant to Mersal's visits to the United States between 1998-2000." Our conditional offer already captures all such repositories. As you know, Saudi Arabia has voluntarily conducted numerous searches of the Embassy and Los Angeles Consulate for documents relating to visits by MoIA employees to the United States to lead prayer during Ramadan, the King Fahad Mosque, Fahad Al Thumairy, Khalid Al Sowailem, Omar Al Bayoumi, and dozens of other topics. These searches would have already captured any documents relating to Mersal's visits to the United States for Ramadan in 1998 and 1999. Saudi Arabia will not voluntarily agree to conduct any additional burdensome searches of these diplomatic and consular facilities, which are in any event immune from discovery.

Sincerely,

/s/ *Andrew C. Shen*

Andrew C. Shen  
*Counsel for the Kingdom of Saudi Arabia*